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*Counsel for Plaintiff,
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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
 YUTING CHEN), DAMIEN DING (A/K/A
 DAMIEN LEUNG, A/K/A TAO DING),
 TEMUJIN LABS INC. (A DELAWARE
 CORPORATION), AND TEMUJIN LABS
 INC. (A CAYMAN CORPORATION),

DEFENDANTS,

and

EIAN LABS INC.,

NOMINAL DEFENDANT.

Case No. 5:20-CV-09340-NC

**DECLARATION OF
 CONSTANTINE P. ECONOMIDES IN
 SUPPORT OF PLAINTIFF'S MOTION
 FOR AN ORDER ALLOWING
 DEFENDANTS LILY CHAO AN
 DAMIEN DING TO BE SERVED (1)
 THROUGH COUNSEL, (2) THROUGH
 TEMUJIN LABS INC. (DELAWARE'S)
 REGISTERED AGENT, (3) BY TEXT,
 OR (4) BY PUBLICATION**

1 1. I am an attorney licensed to practice law in the States of New York and Florida and
 2 admitted to practice before this Court *pro hac vice* to practice. I am counsel with the firm Roche
 3 Freedman LLP, and counsel for Plaintiff Ariel Abittan (“Plaintiff”). I make this declaration based
 4 upon my knowledge of the facts stated herein, and if called to testify, I could and would testify
 5 competently thereto. I submit this declaration in support of Plaintiff’s Motion for an Order
 6 Allowing Defendants Lily Chao and Damien Ding to be Served (1) Through Counsel, (2) Through
 7 Temujin Labs Inc. (Delaware)’S Registered Agent, (3) by Text, or (4) by Publication.

8 1. Attached hereto as Exhibit A is a true and correct copy of a Document
 9 Preservation Notice sent by Petitioner’s prior counsel, Bryan Ketrosier, Esq., to Defendants’
 10 counsel at Fenwick & West LLP (“Fenwick”), dated December 21, 2020.

11 2. Attached hereto as Exhibit B is a true and correct copy of a letter sent from
 12 Plaintiff’s prior counsel, Bryan Ketrosier, Esq. of Alto Litigation, to Defendants’ counsel, Felix
 13 Lee, Esq. (“Mr. Lee”) of Fenwick & West LLP, dated January 8, 2021.

14 3. Attached hereto as Exhibit C is true and correct copy of an email sent from Mr.
 15 Lee to Plaintiff’s counsel, dated January 20, 2021.

16 4. Attached hereto as Exhibit D is true and correct copy of the Declaration of Can
 17 Sun, in Santa Clara Superior Court, *Temujin Labs Inc. v. Franklin Fu*, No. 21CV375422 (filed Jan.
 18 4, 2021) , dated August 2, 2021.

19 5. Attached hereto as Exhibit E is a true and correct copy of an email chain between
 20 the parties’ counsel, wherein Plaintiff’s counsel sent an email to Defendants’ counsel on December
 21 24, 2020, and Defendants’ counsel replied on December 29, 2020.

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 23 Dated: September 20, 2021

ROCHE FREEDMAN LLP

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 25 /s/ Constantine P. Economides
 Constantine P. Economides